



May 28, 2004

Allison Ray  
Alaskan Way Viaduct and Seawall Replacement Project Office  
999 Third Avenue, Suite 2424  
Seattle, WA 98104

RECEIVED  
JUN 01 2004  
AWVSP Team Office

Re: Alaskan Way Viaduct and Seawall Replacement Project DEIS

Dear Ms. Ray:

Thank you for the opportunity to comment on the Alaska Way Viaduct and Seawall Replacement Project DEIS. The analysis of the alternatives for Viaduct and Seawall replacement South of the Battery Street Tunnel is thorough and thoughtful. However, the analysis of various options north of the Battery Street Tunnel (the North segment) lacks the same kind of rigor.

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We have a once-in-a-lifetime opportunity to do the right thing with respect to both Seattle's Waterfront and the North segment. It would be a shame for this region and state to select the right long term solution for the Waterfront and not do the same for the North segment.

While the DEIS recognizes that changes to the North segment are necessary components of a long-term SR 99 corridor solution and short-term construction period traffic mitigation, the only North segment option that is thoroughly analyzed in this DEIS happens to be the only alternative that precludes the best long-term solution for the North segment.

This failure to thoroughly analyze all North segment options appears to be at variance with SEPA requirements and not in the best interests of the City. Therefore, we respectfully request that the Project Team analyze the Lowered Aurora Option and the Surface Option (which includes signalizing Roy, Republican and Harrison Streets) with the same degree of thoroughness and thoughtfulness as the Widened Mercer Underpass option. This should include an equal level of analysis for construction period traffic planning.

#### **Required SEPA Analysis of Project Alternatives, Impacts and Mitigation Measures**

SEPA requires the lead agency to provide a detailed statement on major actions that significantly affect the quality of the human environment. The detailed statement must include: 1) the environmental

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impact of the proposed action; 2) any unavoidable adverse environmental impacts of the proposed action; 3) alternatives to the proposed action; and 4) any irreversible and irretrievable commitments of resources which would occur if the proposed action were implemented. RCW 43.21C.031(1)(c).

SEPA specifically requires an EIS to "devote sufficiently detailed analysis to each reasonable alternative to permit a comparative evaluation of the alternatives including the proposed action." WAC 197-11-440(5)(v).

In this case, the EIS should provide the same level of analysis for impacts of the Lowered Aurora Option and the Surface Option as it does for the Widened Mercer Underpass Option. Id; WAC 197-11-440(6). The EIS does not satisfy this requirement and therefore provides no basis for a comparative evaluation of the impacts of the alternatives.

A more thorough and complete analysis of the Lowered Aurora Option will show improved street grid connections which will have a tremendous impact on this part of Seattle and its neighborhoods.

#### Scoping

During the scoping process, many interested parties, including neighborhood organizations, environmental groups, property owners, and urban design professionals, suggested that the replacement of the Alaska Way Viaduct provides an excellent opportunity to reverse a devastating, decades-old decision. That decision was to sever the South Lake Union neighborhood from the Lower Queen Anne/Uptown neighborhood, by building a surface highway with inadequate and unsightly East-West connections. The street grid was destroyed. During the early phases of studying the Alaska Way Viaduct, it became clear that the street grid could be reestablished by simply lowering Aurora, closing the diagonal Broad Street, and reconnecting the surface streets.

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We were chagrined to find that this DEIS provides little or no analysis of the Lowered Aurora option, despite repeated assurances throughout the scoping process that this option would be carried forward. Furthermore, there has been little analysis of the surface street (with signalized Roy, Republican and Harrison Streets) option. While it is clear that each of these options has impacts, the DEIS provides no comparative analysis of those impacts, and therefore, provides an inadequate basis for making a project decision with respect to the North segment.

The only comparison between the Lowered Aurora and Widened Mercer Underpass alternatives appears to acknowledge some of the relative benefits of the Lowered Aurora alternative. In chapter 6, section 12, the DEIS includes the following comparison between these two sets of improvements:

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"In the North end of the project area, SR 99 is currently a barrier for people and traffic moving between neighborhoods to the east and west. The Widened Mercer improvements would benefit these neighborhoods by improving east-west connections across SR 99 at Mercer and Thomas Streets. The Lowered Aurora/SR 99 option has an even greater potential for improving connections, since up to five streets currently cut off by SR 99 would be reconnected via bridges." (Emphasis added).

While acknowledging that there may be benefits of one option over another, the DEIS makes no effort to distinguish the alternatives in the North segment through sound analysis. In this respect, the DEIS falls short.

It is also interesting to note that this limited discussion of the apparent benefits of the Lowered Aurora option appears only in conjunction with the Aerial Alternative along the Waterfront segment. Of course, this benefit of the Lowered Aurora option (and other benefits that have not yet been analyzed) would apply equally with respect to the Tunnel Option and the Bypass Option.

#### Summary of Unanalyzed Impacts and Likely Lowered Aurora Option Analysis

As indicated, the DEIS falls short of SEPA requirements because it does not adequately identify Project impacts of any alternative other than the Widened Mercer Underpass. Accordingly, the DEIS should be revised to adequately reflect the impacts associated with alternatives other than the Widened Mercer Underpass Option as detailed below.

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In order for the Project Team to make the best choice among alternatives North of the Battery Street Tunnel, it is necessary that the various alternatives be fully analyzed. The improved street grid connections attendant to the Lowered Aurora option, as acknowledged in chapter 6, would have a tremendous impact on this part of Seattle and its neighborhoods.

First, the Lowered Aurora alternative would provide a variety of options for vehicles trying to move east-west across Aurora. This is important for the future of the Mercer Street Corridor, because it would relieve Mercer Street of most of its traffic which is not destined for Interstate 5. In other words, vehicles taking local trips could avoid Mercer Street altogether.

Second, the Lowered Aurora alternative would provide many more, and much more usable and pleasant, options for pedestrians crossing Aurora between the Seattle Center and South Lake Union. Under the widened Mercer alternative, pedestrians could cross only in a busy tunnel at Mercer Street, or across a steep (14 to 18 percent grade) overpass at Thomas Street. The Lowered Aurora option would provide up to five, level-grade pedestrian crossing options.

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Third, the Lowered Aurora provides many more options for transit and bicycle connections across Aurora. Under the Widened Mercer alternative, some forms of transit, such as a streetcar and bicycles, would not be able to cross Aurora at all, because of traffic volumes in the Mercer Street Tunnel and the steep grade on the Thomas Street overpass. On the other hand, the Lowered Aurora option would provide several potential level-grade options for crossing.

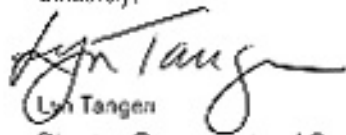
Finally, the reconnection of the street grid and the elimination of the diagonal Broad Street will create a number of new standard City blocks, many of which are owned by the City of Seattle. If this option were selected, these blocks and the adjacent privately-owned blocks could be redeveloped, further knitting the neighborhoods back together and generating significant revenue to the City, through newly-captured property values and tax revenues.

#### The South and Central Segments

This state and region must replace the existing viaduct and seawall. The current level of risk to human life, as well as to property, is untenable. The Project Team has been thorough and complete in its analysis of the various alternatives for the South and Central segments of this project. From this analysis, it appears that the Tunnel Alternative has many advantages over the other alternatives analyzed. If possible, and economically feasible, this region must maintain the vehicular capacity that exists on the current viaduct. More importantly, for the economic and competitive future of this region, we must reclaim and revitalize our waterfront. To date, the biggest obstacle to that goal has been the Alaska Way Viaduct. Today, we have the opportunity to protect the public health and safety and improve our State's economic future with one project, replacing the Alaska Way Viaduct and Seawall. Let's do it right.

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Sincerely,



Lyn Tangen

Director, Government and Community Relations